# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA		Criminal No. 25cr10057
	v.	) Violations:
(1) (2)	DAMIEN WILLETTE, ) WILLIAM WALLEY, "a/k/a ) "Dub," and	Count One: Conspiracy to Make Interstate Communications with Intent to Extort (18 U.S.C. § 371)
(3)	MICHAEL O'SHEA, a/k/a "Easy,"  Defendants	Counts Two and Three: Interstate Communication with Intent to Extort (18 U.S.C. § 875(b))
		Forfeiture Allegation: (18 U.S.C. § 875(b) and 28 U.S.C. § 2461(c))

## **INDICTMENT**

At all times relevant to this Indictment:

# General Allegations

- 1. The Gangster Disciples Gang is a street and prison gang that began in or about the 1960s. Originally, the gang engaged primarily in large-scale drug trafficking and violence in and around Chicago, Illinois. In the decades since its founding, the gang has spread throughout the United States and expanded the scope of its criminal activities.
- 2. The Gangster Disciples Gang is organized according to a hierarchy. Members are required to adhere to the hierarchy by carrying out the leaders' wishes and by showing respect for more senior members.
- 3. The Gangster Disciple members use various terms and symbols to distinguish themselves as an organization. These include the six-pointed star, substituting the letter "G" into words or phrases, the colors black and white, the pitchfork, and referring to members as "G's" or

"Folk," and referring to Gangster Disciples as "Folk Nation."

- 4. Gangster Disciple members are subject to various rules. Those rules include the requirement to "Aid and Assist," which can include sending money to incarcerated members.
- 5. Gangster Disciple members who are in violation of gang rules are subject to a "Violation," which can include physical violence against the offending member.
- 6. Gangster Disciple members can be "Blessed Out," meaning disassociate from the gang, by meeting certain conditions set by other gang members.
- 7. A Gangster Disciple member who disassociates from the gang without being "Blessed Out" is subject to a "Termination," which can include physical violence against the offending member.
- 8. From in or around December 2019, DAMIEN WILLETTE recruited Victim 2 into the Gangster Disciples. In 2020 and at various times later, Victim 2 sought to disassociate with the Gangster Disciples.
  - 9. Victim 1 is the paramour of Victim 2
- 10. From on or about November 6, 2020, to on or about May 7, 2024, DAMIEN WIILLETTE was an inmate in the custody of the Massachusetts Department of Correction ("MADOC").
- 11. From on or about February 18, 2019, to on or about July 1, 2024, WILLIAM WALLEY was an inmate in the custody of the MADOC.
  - 12. WILLIAM WALLEY and Co-Conspirator #1 are family relatives.
  - 13. MICHAEL O'SHEA and Co-Conspirator #2 are family relatives.
  - 14. From on or about August 3, 2018, to August 3, 2023, MICHAEL O'SHEA was an

inmate in the custody of the MADOC.

- 15. From on or about March 5, 2023 to March 22, 2023, DAMIEN WILLETTE was the cellmate of WILLIAM WALLEY.
- 16. From on or about May 5, 2023 to June 28, 2023, DAMIEN WILLETTE was the cellmate of MICHAEL O'SHEA.
- 17. In or around February 2023, through on or about March 11, 2023, Victim 1 voluntarily agreed to "Aid and Assist" by sending money to incarcerated Gangster Disciple members.
- 18. SCORE Inmate Enablement System ("SCORE") is a messaging system accessible to inmates at the MADOC. SCORE is operated by Advanced Technologies Group through a data center in Iowa. Every message sent or received by an inmate through SCORE is processed and recorded in the data center in Iowa. The messages appear as e-mails but are actually a set of database records stored in an encrypted database management system operated by Advanced Technologies Group.
- 19. Securus Technologies system is a voice-over-internet-protocol ("VOIP") telephone system accessible to inmates at the MADOC. Securus Technologies operates its VOIP system through a server in Texas. Securus Technologies also operates a backup server in Georgia. All calls made through the Securus Technologies system at the MADOC are prefaced by the disclaimer that all calls are subject to surveillance and recording.

## Object and Purpose of the Conspiracy

20. The object of the conspiracy was to transmit threats in interstate commerce with the intent to extort money. The principal purpose of the conspiracy was to make money by threatening and extorting Victim 1 and Victim 2.

#### Manner and Means of the Conspiracy

- 21. Among the manner and means by which DAMIEN WILLETTE, WILLIAM WALLEY, MICHAEL O'SHEA, and coconspirators known and unknown to the Grand Jury carried out the conspiracy were the following:
  - a. Threatening Victim 1 with bodily harm and threatening harm to others if
     Victim 1 failed to "Aid and Assist."
  - b. Threatening Victim 1 that if Victim 1 or Victim 2 failed to "Aid and Assist," that Victim 2 would be subject to a "Termination."

### Overt Acts in Furtherance of the Conspiracy

- 22. From in or about February 2023 through in or about June 2023, DAMIEN WILLETTE, WILLIAM WALLEY, MICHAEL O'SHEA, and coconspirators known and unknown to the Grand Jury committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracy:
  - a. On or about March 11, 2023, WILLIAM WALLEY used Securus Technologies to call Co-Conspirator #1. WALLEY stated, "That is how we get all the bread

- (money). So just tell him [GD-1] said he [Victim 2] has to send it. He is scared of him [GD-1]."
- b. On or about March 21, 2023, WILLIAM WALLEY sent a SCORE message to Victim 1 stating, "Yo NBS ("No bullshit") [GD-1] is spazz on bros cuz ya lied about send[ing] 600 and it was only 200[.] [B]ros got into a fight cuz the money was not there [a]nd shit and I almost lost my parole over shit like NBS I stuck my neck out for y'all and shit and now y'all not even text me back and tell me what going on cuz [GD-1's] sis[ter] said she don't need to lie about how much money y'all gave her[.] Like bro told [Victim 2] last night if he find out he lie[,] shit going to get worst and I fell [sic] like [you] disrespect me and smack me in my face and said fuck you[.] [L]ike not one time have I disrespect y'all[,] I showed y'all the up most respect like NBS y'all need to fix this asap and TEXT ME ASAP LIKE DONT DUCK [A]ND MAKE ME CALL TONIGHT."
- c. On or about March 22, 2023, WILLIAM WALLEY sent a SCORE message to Victim 1 stating, "Yo NBS ur have no clue what kind of problem u just placed in ur hands bro[.] [M]om called and no one picked up[.] [L]ike I did everything I can to help y'all and now bro tight cuz ur playing him like a sucker[.] I almost lost my parlor ("parole") over this shit[.] [N]ow I am back in sau ("Secure Adjustment Unit") sick cuz I lost all my canteen[,] lost Nike[,] and high top Nike cuz there was not on my books[.] I lost over 100 dollars in food cuz that 600 did not get sent and now no one hit me[.] [L]ike no email or picking up the phone like shit look crazy[.] [W]hen u see this hit me back ASAP[.] [L]ike stop

- playing fucking games[.] It [is] getting everyone mad and shit not going to look good on ur ("your") end."
- d. On or about March 21, 2023, DAMIEN WILLETTE sent a SCORE message to Victim 1 stating, "[B]ecause of what [Victim 2] already knows about the G shit is the reason he needs him to do his part for the nation until I can come home and bless him[.] [A]nd this is the only way that he can get bless out without it being serious[.] [S]o he needs y'all to understand that and be on the same page that until I can come home and bless him he needs to do his part[.] [A]nd I already told you before to let me know after bills & shit are paid that [GD-1] needs him to aid & assist until that time comes when I'm out to do so."
- Victim 1 stating, "[GD-1] said so its [sic] not a surprise[.] [S]aid that if these games keep going on by this Monday[,] March 28th coming up that I no longer have any say about anything and things are about to get real bad for the both of us[.] [A]nd FYI [GD-1] knows your address[,] so I'm just warning y'all now so you know why shit starts to get crazy that he said instead of just figuring shit out[,] instead of trying to duck and dodge him you would of been straight when I come home[.] [B]ut now that he thinks y'all are trying to test his Gangsta[.] [H]e said that me & y'all will see why he's the top G in the city... [H]e really is one phone call away from having n\*\*\*\*s pull up & that is the last thing anyone wants so please[,] these people are serious people and the only way to calm this

- situation is to figure out how we can come up with a game plan that is affordable for everyone."
- f. On or about May 8, 2023, DAMIEN WILLETTE sent a SCORE message to Victim 1 stating, "I'm telling you right now[,] if [Co-Conspirator #1] doesn't get this 800\$ sent tonight [GD-1] is really going to just have n\*\*\*\*s pull up on you & everyone that is related to you & he don't give a fuck because now your [sic] putting him in a bad position[.] [S]o if this isn't done tonight[,] your [sic] going to wish you just answered my phone calls & texts so & I'm running low on money on this email shit[,] so if I really ain't able to get ahold of you & this last money situation isn't handled it's going to be bad for you & everyone you know[.] [A]nd like I said don't think your fine because you don't have a spot rn ("right now") because he ("GD-1") will find out w[h]ere you are[,] I promise you that & he will make you come out of hiding by showing up to everyone you know[']s houses & he knows were [sic] your office of work is to[o] because he looked it up[,] [S]o I'm telling you one last time if [Co-Conspirator #1] don't have this done tonight it's on you."
- g. On or about May 8, 2023, DAMIEN WILLETTE sent a SCORE message to Victim 1 stating, "[D]on't think that because you got kicked out your spot that [GD-1] is playing with you when it comes to this money situation[.] [H]e is a certified G in Chicago so he has connections everywhere in every state [Victim 1] & you ignoring me today when I am telling you its [sic] important is putting yourself in great issues because he is getting thin with his patients [sic] with the

ignoreing [sic] him bs ("bullshit")[.] [H]e already looked up you & [Victim 2] up both your last names & knows where all your family stays [redacted address]. [H]e just wants to throw that address at you to start[.] [S]o he said if you think about pulling a fast one he will pull up to every know address of people & start with everyone."

- h. On or about May 9, 2023, DAMIEN WILLETTE sent a SCORE message to Victim 1 stating, "It's 12:30 rn ("right now") still no bred ("money")[,] [Victim 1] I don't think your understanding if this dude don't get this money today[,] your [sic] going to have a serious problem & I'm going to have to call [GD-2] & if we send [GD-2] over there your [sic] done[.] [N]\*\*\*\*s are done playing games with you[.] [S]end [GD-1] his fuckin money today or you & [Victim 2] are done deadass[.] [T]his isn't a joke[.] [H]e don't care about what is going on[.] [T]his n\*\*\*a is coming to my cell asking were [sic] is his money is so if I goto [sic] the hole over this & have to fight over this money[,] big problems coming y'all way[.] [G]et it done [Victim 1] now idgaf ("I don't give a fuck") anymore[.] [N]ow I'm getting pissed."
- i. On or about May 9, 2023, DAMIEN WILLETTE sent a SCORE message to Victim 1 stating, "I'm telling you this to[o] [Victim 1][,] [GD-1] said you keep doing this playing games shit[,] when I come home that [Victim 2] won't be getting blessed out & will be making me have n\*\*\*\*s pull up on y'all & have y'all pistol wiped [sic] so if I was y'all I would keep doing what y'all need to so that don't have to happen because if you don't play games with his bred

("money") that he will just let y'all get out of this when I'm released[.] [B]ut if you keep doing this bs ("bullshit") telling him y'all sending money one day then it don't get sent till 3 days later[,] then that's what's going to end up happening & y'all never will be good[.] [S]o [GD-1] said keep playing with him because he said your deadass playin [sic] with fire."

- j. On or about May 14, 2023, MICHAEL O'SHEA used Securus Technologies to call Co-Conspirator #2. During that call, Co-Conspirator #2 asked MICHAEL O'SHEA what MICHAEL O'SHEA has gotten him into. MICHAEL O'SHEA detailed to Co-Conspirator #2 that Victim 1's "man" used to be a Gangster Disciple member and is paying MICHAEL O'SHEA and DAMIEN WILLETTE to demonstrate his loyalty. MICHAEL O'SHEA detailed that Co-Conspirator #1 was untrustworthy, so he needed Co-Conspirator #2 to collect money from Victim 1
- k. On or about May 15, 2023, MICHAEL O'SHEA used Securus Technologies to call Co-Conspirator #2. During that call, MICHAEL O'SHEA instructed Co-Conspirator #2 to convey to Victim 1 that if she is going to "play games" that GD-2 is going to "pull up," meaning visit her to inflict harm on her.
- On or about May 16, 2013, MICHAEL O'SHEA used Securus Technologies to call Co-Conspirator #2. During that call, MICHAEL O'SHEA instructed Co-Conspirator #2 to convey the message to Victim 1 that since she was ignoring

- him and not paying the money, he will have "[GD-2] come find you and your family for thinking it's a game."
- m. On or about May 31, 2023, MICHAEL O'SHEA used Securus Technologies to call Co-Conspirator #2. During that call, MICHAEL O'SHEA instructed Co-Conspirator #2 to convey the message to Victim 1 that "[GD-1] said that if he loses his parole over Victim 1 not sending money that [GD-2] is going to come see you," meaning harm Victim 1
- n. On or about June 1, 2023, MICHAEL O'SHEA used Securus Technologies to call Co-Conspirator #2. During that call, MICHAEL O'SHEA instructed Co-Conspirator #2 to convey the message to Victim 1 that "[GD-1] said that Victim 1 needs to provide money by that night or else [GD-2] would pull up on her," meaning harm Victim 1 MICHAEL O'SHEA continued to instruct Co-Conspirator #2 to convey to Victim 1 that GD-1 said that if he does not get his money that day that GD-2 would find Victim 1 and that Victim 1 and Victim 1's family would be in "direct danger."

#### COUNT ONE

Conspiracy to Make Interstate Communications with Intent to Extort (18 U.S.C. § 371)

The Grand Jury charges:

- 21. The Grand Jury re-alleges and incorporates by reference paragraphs 1-20 of this Indictment.
- 22. From in or about March 2023 through in or about June 2023, in the District of Massachusetts, and elsewhere, the defendants,

(1) DAMIEN WILLETTE, (2) WILLIAM WALLEY, a/k/a "Dub," and (3) MICHAEL O'SHEA, a/k/a "Easy,"

conspired with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, to wit, knowingly and with intent to extort money from Victim 1 and Victim 2, to transmit in interstate commerce, communications to Victim 1 to extort money, and the communications contained a threat to injure Victims 1 and 2, and others, specifically by physical violence, in violation of Title 18, United States Code, Section 875(b).

All in violation of Title 18, United States Code, Section 371.

# COUNT TWO Interstate Communication with Intent to Extort (18 U.S.C. § 875(b))

The Grand Jury further charges:

- 23. The Grand Jury re-alleges and incorporates by reference paragraphs 1-20 of this Indictment.
- 24. On or about May 8, 2023, in the District of Massachusetts, and elsewhere, the defendant,

# (1) DAMIEN WILLETTE,

knowingly and with intent to extort money from Victim 1, did transmit in interstate commerce, a communication to Victim 1, and the communication contained a threat to injure Victim 1 and others, specifically by physical violence.

All in violation of Title 18, United States Code, Section 875(b).

# COUNT THREE Interstate Communication with Intent to Extort (18 U.S.C. § 875(b))

The Grand Jury further charges:

- 25. The Grand Jury re-alleges and incorporates by reference paragraphs 1-20 of this Indictment.
- 26. On or about March 22, 2023, in the District of Massachusetts, and elsewhere, the defendant,

# (2) WILLIAM WALLEY, a/k/a "Dub,"

knowingly and with intent to extort money from Victim 1, did transmit in interstate commerce, a communication to Victim 1, and the communication contained a threat to injure Victim 1 and others, specifically by physical violence.

All in violation of Title 18, United States Code, Section 875(b).

# FORFEITURE ALLEGATION (18 U.S.C. § 875(b) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

- 1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 875(b), set forth in Counts Two and Three, the defendants,
  - (1) DAMIEN WILLETTE, and (2) WILLIAM WALLEY, a/k/a "Dub,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 875(b), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

- 2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 875(b) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants -
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 875(b), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS

District of Massachusetts: 2/12/2215
Returned into the District Court by the Grand Jurors and filed.

02/12/2025

**DEPUTY CLERK**